

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

v.

EDWARD B. ELLIS,

Defendant

No. 89cr30018-MGM

**MOTION TO CONTINUE VIOLATION HEARING**  
**Assented to**

The United States of America, with the assent of the defense counsel, moves to continue the violation hearing now set for November 20, 2014, until a date after conclusion of state criminal proceedings.

As grounds for this motion, the government states:

1. The government's revocation petition is based on events that, if proven, would constitute a violation of state law.

2. At the time the government brought forward its revocation petition, the state had not initiated criminal proceedings relating to the events underlying the petition.

3. On November 14, 2014, the government learned the state planned to seek a criminal complaint. On November 17, 2014, the government learned a probable cause hearing is scheduled for December 4, 2014.

4. The parties agree it is in the interest of judicial economy to allow the state case to proceed because its outcome may obviate the need for a contested hearing.

WHEREFORE, the government respectfully requests the court continue the November 20, 2014, revocation hearing until a later date to be determined.

Respectfully submitted,

CARMEN M. ORTIZ  
UNITED STATES ATTORNEY

By: /s/Karen L. Goodwin  
KAREN L. GOODWIN  
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Dated: 11/17/14

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/Karen L. Goodwin

Karen L. Goodwin  
Assistant United States Attorney

Date: November 17, 2014